

BEFORE THE
POSTAL RATE COMMISSION

RECEIVED
JUL 24 10 37 AM '97
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

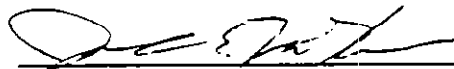
DOCKET NO. R97-1

**SECOND SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MAYES
(UPS/USPS-T37-11 through 12)**

(July 24, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Mayes (UPS/USPS-T37-11 through 12).

Respectfully submitted,



John E. McKeever
Albert P. Parker
Stephanie Richman
Attorneys for United Parcel Service

Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
(215) 751-2200

and

1913 Eye Street, N.W., Suite 600
Washington, D.C. 20006-2106
(202) 463-2900

Of Counsel.

**INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS MAYES**

UPS/USPS-T37- 11. Under the proposed rates, what total dollar contribution to institutional cost recovery in the test year after rates will be made by:

- (a) Parcel Post as a whole;
- (b) Parcel Post mail that qualifies for the BMC presort discount;
- (c) Parcel Post mail that qualifies for the origin BMC entry discount;
- (d) Parcel Post mail that qualifies for the DSCF entry discount;
- (e) Parcel Post mail that qualifies for the DDU entry discount;
- (f) Parcel Post mail that does not meet the qualifications for any of the

discounts mentioned in parts (b), (c), (d), and (e) above?

UPS/USPS-T37-12. On page 23 of your testimony you discuss the impact of a new service , "Packaging Service," on the volume of Parcel Post. Please provide a complete description of Packaging Service, including its costs, volumes, rates, operational description, and any surveys supporting the proposal.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.



John E. McKeever

Dated: July 24, 1997
Philadelphia, Pa.